

U.S. Department of Justice



**MEMO ENDORSED** *United States Attorney  
Southern District of New York*

*United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

June 20, 2022

**BY CM/ECF**

The Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

**Re: *United States v. Patrick Chellel, et al., S1 21 Cr. 441 (KMK)***

Dear Judge Karas:

The Government respectfully writes, with the consent of the defendants, to request an adjournment of the next pretrial conference in this matter, currently scheduled for June 30, 2022.

As the Court is aware, the parties were all last before the Court on April 22, 2022 for a pretrial conference. Since that appearance, the Government has produced additional Rule 16 discovery in light of the superseding indictment, which the defendants are still reviewing. Additionally, the Government is in the final stages of producing an additional forensic extraction from a device seized after the arrest of defendant Patrick Chellel. Based on the above, the Government believes that an adjournment of the next pretrial conference for approximately 45 to 60 days will serve the ends of justice and conserve judicial resources as the parties continue to produce and review discovery while also discussing potential pretrial resolutions.

Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from June 30, 2022 through the date of the rescheduled pretrial conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow (i) the Government to complete production of additional discovery in light of the superseding indictment; (ii) defense counsel time to continue reviewing that discovery; and (iii) allow continued discussions regarding potential pretrial resolutions.

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Accordingly, the Government respectfully encloses a proposed order excluding time.

Granted. The conference is adjourned  
to 9/ 14 /22, at 11:00

So Ordered.

6/21/22

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:

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cc: Counsel of Record (by CM/ECF)